

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____)	
In re:)	Chapter 11
)	
VOYAGER DIGITAL HOLDINGS, INC., <i>et al.</i> , ¹)	Case No. 22-10943 (MEW)
)	
Debtors.)	(Jointly Administered)
_____)	

**SUPPLEMENTAL DECLARATION OF SHERYL BETANCE
IN SUPPORT OF DEBTORS' APPLICATION FOR
ENTRY OF AN ORDER AUTHORIZING THE EMPLOYMENT
AND RETENTION OF STRETTO, INC. AS ADMINISTRATIVE ADVISOR TO THE
DEBTORS EFFECTIVE AS OF THE PETITION DATE**

I, Sheryl Betance, declare under penalty of perjury that the following is true and correct to the best of my knowledge, information, and belief:

1. I am a Senior Managing Director of Stretto, Inc. ("Stretto"), a chapter 11 administrative services firm with offices at 410 Exchange, Ste. 100, Irvine, CA 92602. Except as otherwise noted, I have personal knowledge of the matters set forth herein, and if called upon as a witness, I could and would testify competently thereto.

2. This declaration is made in further support of the *Debtors' Application for Entry of an Order Authorizing the Employment and Retention of Stretto, Inc. as Administrative Advisor to the Debtors Effective as of the Petition Date* [Docket No. 97] (the "Application").²

3. Buchalter has been identified as a Potential Party in Interest. Caroline Djang, a shareholder of Buchalter, is a current client of Stretto's chapter 7 software business in her

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Debtors' principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003.

² Capitalized terms have the meanings set forth in the Application.

individual capacity, but such relationship is unrelated to the Debtors and their estates, assets, or businesses.

4. FTI Consulting Inc. has been identified as a Potential Party in Interest. Guy Davis, an employee of FTI Consulting Inc., is a current client of Stretto's chapter 7 software business in his individual capacity, but such relationship is unrelated to the Debtors and their estates, assets, or businesses.

5. Additionally, the list of Potential Parties in Interest includes the State of Texas and Wells Fargo, which are current, former, or potential defendants to avoidance actions brought under the Bankruptcy Code by clients of Stretto Recovery Services. However, to the best of my knowledge, such relationships are materially unrelated to these chapter 11 cases.

6. To the extent any information disclosed herein requires amendment or modification upon Stretto's completion of further review or as additional party-in-interest information becomes available to Stretto, a further supplemental declaration will be filed stating such amended or modified information.

7. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge and belief.

Dated: September 15, 2022
New York, New York

/s/ Sheryl Betance

Sheryl Betance
Senior Managing Director
Stretto
410 Exchange, Ste. 100
Irvine, California 92602